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Attorneys for Specially Appearing Defendants

7 FIDELITY NATIONAL TITLE INSURANCE COMPANY and

8 CHICAGO TITLE INSURANCE COMPANY

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11
12 DEUTSCHE BANK NATIONAL TRUST
COMPANY,

13 Plaintiff,

14 vs.

15 FIDELITY NATIONAL TITLE
16 INSURANCE COMPANY, et al.,

17 Defendant.

Case No.: 2:19-cv-00409-GMN-VCF

**STIPULATION AND ORDER
EXTENDING SPECIALLY
APPEARING DEFENDANT CHICAGO
TITLE INSURANCE COMPANY'S
TIME TO RESPOND TO COMPLAINT**

(First Request)

18
19 Plaintiff Deutsche Bank National Trust Company, as Indenture Trustee, on Behalf of the
20 Holders of the Accredited Mortgage Loan Trust 2004-3 Asset-Backed Notes ("Deutsche Bank")
21 and specially appearing Defendants Fidelity National Title Insurance Company ("Fidelity") and
22 Chicago Title Insurance Company ("Chicago Title," and with Fidelity and Deutsche Bank, the
23 "Parties"), by and through their counsel of record, hereby stipulate as follows:

24 WHEREAS, Deutsche Bank filed its complaint in this matter on March 8, 2019 (ECF No.
25 1);

26 WHEREAS, Deutsche Bank served the complaint on Fidelity and Chicago Title on May 2,
27 2019 (ECF Nos. 6-7);

WHEREAS, Fidelity filed a motion to dismiss the complaint on May 7, 2019 (ECF No. 4);

1 WHEREAS, the Parties recently discovered that, due to an inadvertent error, Chicago
2 Title has not yet filed a response to the complaint;

3 WHEREAS, Deutsche Bank has agreed to extend Chicago Title's time to respond to the
4 complaint to November 22, 2019; and

5 WHEREAS, this is the first stipulation for an extension of Chicago Title's time to respond
6 to the complaint.

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1 Now, therefore, the parties hereto, by and through their counsel of record, hereby stipulate
2 and agree as follows:

- 3 1. Chicago Title shall file its response to the complaint on or before November 22, 2019.
4 2. Chicago Title intends to preserve its right and do not expressly waive any and all
5 defenses listed in Fed. R. Civ. P. 12(b), including with respect to whether it is subject
6 to personal jurisdiction in this forum.
7

8 Dated this 13th day of November 2019

EARLY SULLIVAN WRIGHT
GIZER & McRAE LLP

9
10 By: /s/--Sophia S. Lau
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12 8716 Spanish Ridge Avenue, Suite 105
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13

14 Attorneys for Specially Appearing Defendants Fidelity
National Title Insurance Company and Chicago Title
Insurance Company
15

16 Dated this 13th day of November 2019

WRIGHT, FINLAY & ZAK, LLP

17 By: /s/--Lindsay D. Robbins
Matthew S. Carter, Esq.
18 Nevada Bar No. 9524
Lindsay D. Robbins, Esq.
19 Nevada Bar No. 13474
7785 W. Sahara Ave., Suite 200
20 Las Vegas, NV 89117

21 Attorneys for Deutsche Bank National Trust Company,
as Indenture Trustee, on Behalf of the Holders of the
22 Accredited Mortgage Loan Trust 2004-3 Asset-Backed
Notes
23

24 **ORDER**

25 **IT IS SO ORDERED:**

26 November 15, 2019
27 Dated: _____

By: 
UNITED STATES MAGISTRATE JUDGE

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on November 13, 2019 the foregoing **STIPULATION AND ORDER**
3 **EXTENDING DEFENDANT CHICAGO TITLE INSURANCE COMPANY'S TIME TO**
4 **RESPOND TO COMPLAINT (First Request)** was served to all parties and counsel identified
5 on the CM/ECF System via Electronic Notification, including the following:

6
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8 Wright Finlay & Zak, LLP
9 7785 W. Sahara Ave., Suite 200
10 Las Vegas, NV 89117
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/s/ Sophia S. Lau
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